

# **U.S. Department of Justice**

United States Attorney Eastern District of New York

GMP:MPR F. #2009R01065 271 Cadman Plaza East Brooklyn, New York 11201

October 17, 2017

### By Hand and ECF

A. Eduardo Balarezo, Esq. 400 Seventh Street, N.W. Suite 306 Washington, D.C.

Re: United States v. Joaquin Archivaldo Guzman Loera

Criminal Docket No. 09-466 (S-4) (BMC)

#### Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57. The government is also producing draft transcripts pursuant to the September 12, 2017 signed stipulation between the parties. This supplements discovery previously provided to the defense on March 8, 2017, April 10, 2017, May 5, 2017, June 7, 2017, July 21, 2017, and September 19, 2017. The government will continue to produce discovery on an ongoing basis. The government also requests reciprocal discovery from the defendant.

# The Government's Discovery

Bates-stamped numbers Description

00000054089 – 00000057194 Documents related to intercepted wire

communications and drug, weapon and money seizures, including photographs

and scientific reports

00000057195 – 00000066098	Documents related to drug seizures, including photographs, scientific reports, and drug ledgers; intercepted electronic communications and accompanying draft translations
00000066099 - 00000089134	Intercepted electronic communications and accompanying draft translations
00000089135 - 00000091531	Documents related to intercepted wire and electronic communications
00000091532 - 00000091540	Photographs of the defendant
00000091541 - 00000091777	Documents related to drug, weapon and money seizures, including photographs and scientific reports
00000091778 – 00000091791	Documents received from the Department of State
00000091792 - 00000091824	Documents related to drug seizures, including photographs and scientific reports
00000091825 - 00000091827	Letter from the defendant

00000091828 Drug ledger

00000091829 Intercepted wire communications

Very truly yours,

BRIDGET M. ROHDE ACTING UNITED STATES ATTORNEY Eastern District of New York 271 Cadman Plaza East Brooklyn, New York 11201

ARTHUR G. WYATT, CHIEF Narcotic and Dangerous Drug Section Criminal Division, U.S. Department of Justice

OF COUNSEL:

BENJAMIN J. GREENBERG ACTING UNITED STATES ATTORNEY Southern District of Florida

### Enclosures

cc: Clerk of the Court (BMC) (by ECF) (without enclosures)